

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTSFILED  
CLERK'S OFFICE-----X  
STEVEN JAMES PRZYBORSKI  
Plaintiff

V

MIDLAND CREDIT MANAGEMENT, INC.  
AND LINDNER AND ASSOCIATES, PC  
Defendants  
-----X

CASE NO. 04-10470-NG

U.S. DISTRICT COURT  
DISTRICT OF MASS.FILING FEE PAID:  
RECEIPT # 57029  
AMOUNT \$ 375.00  
BY DPTY CLK  
DATE 7/2/04**MOTION FOR LEAVE TO ADMIT JONATHAN D. ELLIOT PRO HAC VICE**

In accordance with Rule 83.5.3(b), Steven S. Broadley, a member of the bar of this Court and the Commonwealth of Massachusetts, respectfully moves for the admission pro hac vice of Jonathan D. Elliot of the Law Firm of Kleban & Samor, P.C., 2425 Post Road, Southport, CT 06890, to appear and practice in this Court on this case as co-counsel for defendant Midland Credit Management, Inc. As detailed in the Affidavit of Attorney Elliot (attached hereto as Exhibit A) he is a member of the bar in good standing in every jurisdiction in which he has been admitted to practice. There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction, and he is familiar with the local rules of the United States District Court for the District of Massachusetts. Payment of the \$50.00 admission fee has been submitted to the Clerk of the Court. I have previously entered my appearance as counsel for the defendant, National Financial Systems, Inc.

**WHEREFORE**, Steven S. Broadley hereby respectfully requests that the Court grant this Motion for Leave to Admit Jonathan D. Elliot Pro Hac Vice.

Respectfully submitted,

**MIDLAND CREDIT MANAGEMENT, INC.**

By its attorneys,



Steven S. Broadley, BBO #542305  
Posternak Blankstein & Lund, LLP  
Prudential Tower  
800 Boylston Street, 32<sup>nd</sup> Floor  
Boston, MA 02199-8004  
617-973-6100

Of counsel: Jonathan D. Elliot, Esquire  
Federal Bar No. 05762  
Kleban & Samor, P.C.  
2425 Post Road  
Southport, CT 06490  
(203) 254-8968

**CERTIFICATE OF SERVICE**

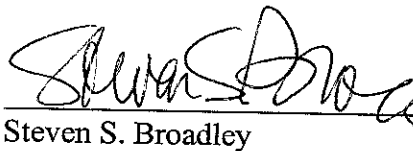
I, Steven S. Broadley, Esquire of Posternak, Blankstein & Lund, LLP, hereby certify that on this 1 day of July, 2004, I caused a copy of the above to be delivered to:

**Certified Mail**

Steven James Przyborski, J.D.  
98 Morrison Avenue #1  
Somerville, MA 02144

**Regular Mail**

Jonathan D. Elliot, Esquire  
Kleban & Samor, P.C.  
2425 Post Road  
Southport, CT 06490

  
Steven S. Broadley

FILED  
IN CLERKS OFFICE

2004 JUL -2 P 1:12

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DISTRICT OF MASS

UNITED STATES DISTRICT COURT  
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STEVEN JAMES PRZYBORSKI  
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CASE NO. 04 10470NG

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Defendants  
-----X

JUNE 24, 2004

**AFFIDAVIT OF JONATHAN D. ELLIOT**

I, Jonathan D. Elliot, do hereby state, as follows:

1. I am a shareholder and attorney in the law firm of Kleban & Samor, P.C. 2425 Post Road, Southport, CT 06890. I represent Midland Credit Management, Inc. one of the defendants in this action.
2. I am an attorney admitted to practice in the following courts: State Courts of Connecticut, United States District Court for the District of Connecticut United States District Court for the Southern District of New York; United States District Court for the Eastern District of New York; United States Court of Appeals for the Second Circuit, and United States Tax Court. I am a member in good standing of the bar of each of the foregoing courts.
3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
4. I have read and am familiar with the Local Rules of the United States Court for the District of Massachusetts in the above-captioned matter.

Exhibit A

5. I respectfully request admission pro hac vice to the United States District Court for the District of Massachusetts.

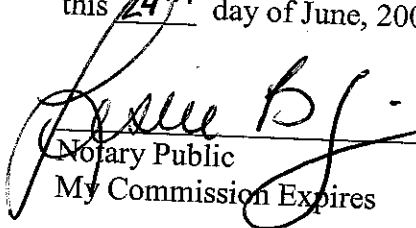
Dated: June 24, 2004  
Southport Connecticut

By: \_\_\_\_\_

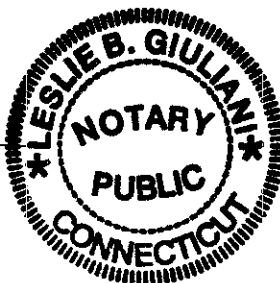


Jonathan D. Elliot  
Kleban & Samor, P.C.  
2425 Post Road  
Southport, CT 06890  
Tel: 203-254-8969  
Fax: 203-259-9617

Subscribed and sworn to before me  
this 24<sup>th</sup> day of June, 2004:



Notary Public  
My Commission Expires




**LESLIE B. GIULIANI**  
**NOTARY PUBLIC**  
MY COMMISSION EXPIRES NOV. 30, 2008

**CERTIFICATE OF SERVICE**

I, Steven S. Broadley, Esquire of Posternak, Blankstein & Lund, LLP, hereby certify that on this 1 day of July, 2004, I caused a copy of the above to be delivered by certified mail to:

Steven James Przyborski, J.D.  
98 Morrison Avenue #1  
Somerville, MA 02144

  
\_\_\_\_\_  
Steven S. Broadley